

From: [MCCLINCY Matt](#)
To: [Sean Sheldrake/R10/USEPA/US@EPA](#)
Cc: [ANDERSON Jim M](#); [POULSEN Mike](#); [PETERSON Jenn L](#); [BAYUK Dana](#); [Chip Humphrey/R10/USEPA/US@EPA](#); [Kristine Koch/R10/USEPA/US@EPA](#); [Richard Muza/R10/USEPA/US@EPA](#); [GAINER Tom](#)
Subject: RE: Gasco EE/CA - draft EPA comments
Date: 09/14/2012 12:17 PM

Sean,

Per the earlier e-mail exchange below, DEQ has not received additional direction on prioritizing our reviews of the EE/CAs and in-water FS, and we are still working on completing our review of the GASCO EE/CA. It is not clear from your e-mail what the schedule is for forwarding EPA's review comments on the GASCO EE/CA to NWN and Siltronic other than "soon". DEQ wants to confirm that the draft comment set is not the final comment set, and that DEQ can provide detailed review comments after this initial set is transmitted.

We also wanted to clarify if EPA's comment set is going to include the comment authorship or if they are going to be transmitted as EPA's review comments which is our preference.

Matt McClincy

From: Sean Sheldrake [mailto:Sheldrake.Sean@epamail.epa.gov]
Sent: Thursday, August 02, 2012 6:54 PM
To: MCCLINCY Matt
Cc: ANDERSON Jim M; BAYUK Dana; Chip Humphrey; GAINER Tom; Kristine Koch; Peterson, Lance; PETERSON Jenn L; POULSEN Mike
Subject: Re: In-Water FS and EE/CA Review Schedules

Matt, Good questions. Due to the overlap, there are certain issues that we will be deferring to the FS (your example is a good one). As we draft the Gasco comment set, I think the topics that we'll be able to finalize comments on and transmit to NWN/Siltronic will be an ongoing process with the FS. At this point, I do intend to get feedback to the respective PRPs on both projects such that we can seek document revisions for our administrative record, as needed.

I hope to have more information for you as I go through the Gasco comment set with Chip and Kristine.

Thanks

S

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Health and Safety (EPA only): <http://204.47.216.153:9876/r10/infopage/cleanup.nsf/webpage/H&SecI>
Deliveries: Parking Garage mailroom (1st floor)
Visitors: Check-in @ PERC / Service Center on 12th floor:
<http://yosemite.epa.gov/r10/extaff.nsf/Homepage/Visiting+Seattle>

From: MCCLINCY Matt <MCCLINCY.Matt@deg.state.or.us>
To: Sean Sheldrake/R10/USEPA/US@EPA, Kristine Koch/R10/USEPA/US@EPA, Chip Humphrey/R10/USEPA/US@EPA
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Date: 08/02/2012 09:07 AM
Subject: In-Water FS and EE/CA Review Schedules

Sean, Kristine and Chip,

DEQ asks your input on an issue involving the review of the PH draft FS, the Gasco draft EE/CA, & the Arkema draft EE/CA. The review schedule for the 3 documents puts final comments for the draft PH FS out later than comments on the 2 EE/CAs.

There's a fair amount of overlap between the 3 documents, and we don't want decisions made on either of the 2 EE/CAs to set precedence for the draft PH FS. For instance, both EE/CAs incorporate portions of the LWG's PH FS models..., creating and opportunities for review of the EE/CAs to set precedence for the PH FS. Based on discussions during the last two TCTs, DEQ understood that EPA was going to provide direction on integrating the EE/CA reviews with the FS. Specifically, we want EPA to identify which sections of the GASCO and Arkema EE/CAs DEQ should focus on as part of our reviews, and what sections will be integrated into the in-water FS review. Besides ensuring the EE/CAs are consistent with the in-water FS, this will make the current reviews more efficient.

So far, DEQ has only provided high level comments on the GASCO EE/CA. We intend to complete a detailed review. However, we are waiting on direction from EPA as to which sections to focus on. Hopefully, direction will be provided shortly. Lacking direction, DEQ intends to prioritize its resources over the next two months on completing a review of the Draft Arkema EE/CA and the GASCO EE/CA over the next two to three months. This reflects the importance of the Arkema and GASCO sites from DEQ's perspective and assumes that we will not be provided another opportunity to comment until either revised EE/CAs are prepared or as part of the harbor-wide

proposed plan. Please be advised, if we focus on the EE/CAs in the next two to three months, DEQ's ability to support the in-water RI/FS elements during this time will be limited.

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Sent: Friday, September 14, 2012 10:23 AM
To: Alanna Conley; cyril.alex@deq.state.or.us; cora.iori@epa.gov; BAYUK Dana; Elizabeth Allen; fuentes.rene@epa.gov; Genevieve.Angle@noaa.gov; PETERSON Jenn L; jeremy_buck@fws.gov; ANDERSON Jim M; STRAUGHAN John; Peterson, Lance; MCCLINCY Matt; POULSEN Mike; Nancy.Munn@noaa.gov; Mark Ader; Chip Humphrey; Kristine Koch; Sean Sheldrake; Richard Muza; (b) (6) aebbets@stratusconsulting.com; audiehuber@ctuir.com; Brandy Humphreys; cunninghame@gorge.net; colin@ridolfi.com; dallen@stratusconsulting.com; erin.madden@gmail.com; jdww@jdww-law.net; Jennifer Peers; jweis@hk-law.com; Michael Karnosh; matt@jdww-law.net; rose@yakamafish-nsn.gov; tomd@ctsi.nsn.us; KEPLER Rick J; Robert.Neely@noaa.gov; shephard.burt@epa.gov; ted_buerger@fws.gov; GAINER Tom
Subject: Gasco EE/CA - draft EPA comments

All,

Please see the draft comments below which EPA will be transmitting soon to NWN and Siltronic to begin EE/CA revision--fyi. A few notes:

1. This comment set is still undergoing EPA review--comments are still being revised/deleted.
2. Siltronic comments will not be incorporated (they are a respondent and have to work their issues through with their co-respondent).
3. Treatment of USACE comments are not yet resolved. EPA will be reviewing data USACE has provided to determine what the project boundary should be at this time.

4.

A number of placeholder comments revolve around the following FS issues, which may be transmitted for clarity that these items are unresolved:

1. Fate and Transport/MNR
2. Dredging Evaluation
3. Benthic Risk Evaluation
4. Identification of Hot Spots and PTM

Moving forward on the Gasco specific comments now will inevitably save time in working through issues that may be difficult and/or require use our dispute resolution process.

Let me know if you have any questions.

S

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Health and Safety (EPA only): <http://204.47.216.153:9876/r10/infopage/cleanup.nsf/webpage/H&SecI>
Deliveries: Parking Garage mailroom (1st floor)
Visitors: Check-in @ PERC / Service Center on 12th floor:
<http://yosemite.epa.gov/r10/extaff.nsf/Homepage/Visiting+Seattle>